

### **Ex-USS Kittiwake (ASR-13) Vessel-to-Reef Project**

- The ex-USS Kittiwake (Kittiwake) vessel-to-reef project is the Maritime Administration's (MARAD) official pilot project for the transfer of a ship to a foreign government, specifically, the Cayman Islands Government in partnership with the Cayman Islands Tourism Association (hereafter referred together as CI), for the purposes of creating an artificial reef in waters off the Cayman Islands.
- Prior to issuing CI title of the vessel, MARAD wants no further objections from EPA regarding the vessel preparation/clean-up plan. In a December 18, 2008 correspondence from EPA to MARAD, EPA had no further concerns regarding the application and remediation plan for the proposed use of the Kittiwake as a vessel-to-reef project contingent upon (1) completing actions directed at vessel cleanup, and (2) certifying the vessel was inspected by a third party prior to its departure from the U.S. Currently, MARAD and Cayman Islands Government are finalizing the vessel title transfer agreement.
- Prior to Kittiwake's departure from the U.S., provided the vessel cleanup/preparation plan is implemented as written, EPA believes the vessel will meet the same required cleanup goals had this vessel been sunk as an artificial reef in waters of the U.S. More specifically, the vessel will be inspected by a third party to verify vessel cleanup in accordance with EPA/MARAD's 2006 *National Guidance for Best Management Practices for Preparing Vessels Intended to Create Artificial Reefs* (BMPs). The BMPs identify and provide cleanup goals for fuels and oil, asbestos, polychlorinated biphenyls (PCBs), paints, debris (e.g., vessel debris, floatables, introduced material), and other materials of environmental concern (e.g., mercury, refrigerants).
- The Kittiwake PCB remediation plan, if implemented as written, will exceed the BMP PCB cleanup goal: The Kittiwake PCB remediation plan requires the removal of all materials and manufactured products known or suspected to contain or be contaminated by PCBs regardless of concentration with the exception of paint containing < 50 ppm.
- Prior to the vessel's departure from the U.S., should CI be unsuccessful in either acquiring necessary permits and approvals to sink the vessel in the Cayman Islands or cannot achieve the vessel cleanup goals, CI will arrange for the scrapping of the Kittiwake in the U.S.
- The London Convention is extended to the Cayman Islands and is enacted in local legislation under the Merchant Shipping Law. CI is required to obtain an ocean disposal permit under this law prior to sinking the vessel. The Cayman Islands Director of the Department of the Environment issues this permit.
- In August 2009, the Basel Action Network (BAN), a U.S.-based environmental group, contacted the CI project manager. BAN's concerns were focused on where and how the vessel would be cleaned (specifically PCBs, hull cleaning for invasive species, paint, and asbestos).

### **Additional background information**

- The ex-USS Kittiwake is a 251 foot submarine rescue ship with a keel date of 1945 and is currently moored at MARAD's James River Reserve Fleet in Fort Eustis, Virginia.
- Hull cleaning will occur prior to the Kittiwake's departure from the U.S., but no sooner than 3 weeks. The Commonwealth of Virginia issued a concurrence letter responding to the Cayman Islands hull cleaning proposal. To further address the potential of invasive species introduction, only potable water will be placed in ballast tanks.
- Anticipated Project Schedule:
  - November 2009 – transfer title to Cayman Islands Government; tow vessel to Norfolk, VA for cleaning)
  - April 2010 – conduct vessel remediation and inspections, and receive approvals
  - Late May 2010 – tow vessel from Norfolk, Virginia to Cayman Islands
  - Late June, 2010 – sink vessel off the Cayman Islands coast